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UNITED PUBLIC WORKERS,
AFSCME, LOCAL 646, AFL-CIO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

JEANNE ENDO,)	CIVIL NO. CV03-00563 LEK
)	
Plaintiff,)	DEFENDANT UNITED PUBLIC
)	WORKERS' MOTION IN LIMINE
vs.)	RE: SETTLEMENT
)	DISCUSSIONS; MEMORANDUM
UNITED PUBLIC WORKERS,)	IN SUPPORT OF MOTION;
AFSCME LOCAL 646, AFL-CIO,)	CERTIFICATE OF SERVICE
)	
Defendant,)	
)	
vs.)	TRIAL DATE: 5/13/08
)	TRIAL JUDGE: Judge Leslie E.
GARY W. RODRIGUES,)	Kobayashi
)	
Third-Party Defendant.)	
)	
)	
)	

DEFENDANT'S MOTION IN LIMINE RE: SETTLEMENT DISCUSSIONS

Defendant United Public Workers, AFSCME Local 646, AFL-CIO ("UPW"), respectfully moves this Honorable Court for an order *in limine* to prohibit evidence about settlement discussions between UPW and Plaintiff Jeanne Endo.

This motion is made pursuant to Rule 7 of the Federal Rules of Civil Procedure and Rules 408 of the Federal Rules of Evidence, and is based upon the memorandum attached hereto, the records and files herein, and such further argument as may be made by counsel at the hearing hereon.

DATED: Honolulu, Hawaii, April 22, 2008.



JAMES E.T. KOSHIBA
CHARLES A. PRICE
Attorneys for Defendant
UNITED PUBLIC WORKERS, AFSCME
LOCAL 646, AFL-CIO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JEANNE ENDO,)	CIVIL NO. CV03-00563 SPK KSC
)	
Plaintiff,)	MEMORANDUM IN SUPPORT OF
)	MOTION
vs.)	
)	
UNITED PUBLIC WORKERS,)	
AFSCME LOCAL 646, AFL-CIO,)	
)	
Defendant,)	
)	
vs.)	
)	
GARY W. RODRIGUES,)	
)	
Third-Party Defendant.)	
)	
)	

MEMORANDUM IN SUPPORT OF MOTION

Dayton Nakanelua, State Director of Defendant United Public Workers, AFSCME Local 646, AFL-CIO ("UPW") has had past settlement discussions directly with Plaintiff Jeanne Endo. Per FRE Rule 408, any evidence of such discussions is inadmissible. UPW does not anticipate any opposition to this motion, but, in an abundance of caution, wants to ensure that Plaintiff is aware of the rule prohibiting any testimony about such discussions.

For the foregoing reasons, UPW respectfully requests that the Court grant its motion for an order *in limine* prohibiting evidence about past settlement discussions.

DATED: Honolulu, Hawaii, April 22, 2008.

A handwritten signature in cursive script, appearing to read "Charles Price", written in dark ink.

JAMES E.T. KOSHIBA
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Attorneys for Defendant
UNITED PUBLIC WORKERS,
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IN THE UNITED STATES DISTRICT COURT
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JEANNE ENDO,)	CIVIL NO. CV03-00563 SPK KSC
)	
Plaintiff,)	CERTIFICATE OF SERVICE
)	
vs.)	
)	
UNITED PUBLIC WORKERS,)	
AFSCME LOCAL 646, AFL-CIO,)	
)	
Defendant,)	
)	
vs.)	
)	
GARY W. RODRIGUES,)	
)	
Third-Party Defendant.)	
)	
)	

The undersigned hereby certifies that the date noted below, true and correct copies of the forgoing document were duly served electronically, addressed as follows:

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Attorney for Plaintiff
JEANNE ENDO

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Attorney for Third-Party Defendant
GARY W. RODRIGUES

DATED: Honolulu, Hawaii, April 22, 2008.

A handwritten signature in cursive script, reading "Charles A. Price". The signature is written in dark ink and is positioned above a horizontal line.

JAMES E.T. KOSHIBA
CHARLES A. PRICE
Attorneys for Defendant
UNITED PUBLIC WORKERS,
AFSCME, LOCAL 646, AFL-CIO